

² The parties had scheduled to meet on November 27 by Zoom. Plaintiff had connectivity issues that prevented meeting in person; therefore, at his request, the Parties worked out the details of this form over email.

If yes, under what Rule? Rule 12(b)(6), Rule 56

If yes, specify the issue? Defendant filed a motion to dismiss for failure to state a claim. Defendant anticipates filing a motion for summary judgment on the issue of liability.

Proposed deadline for filing dispositive motions: Defendant filed a motion to dismiss on November 10, 2023. The parties propose to file their summary judgment motions 30 days after the close of discovery.

Does either side anticipate the use of experts? No

If yes, what is the proposed deadline for expert discovery? _____

Approximate date case should be trial-ready: June 21, 2024

Time for Plaintiff's case: 2 days Time for Defendant's case: 2 days

Is a settlement conference likely to be helpful? No If so, when: _____

Do parties wish to proceed before a Magistrate Judge for final disposition? No

Plan for Discovery

1. The parties anticipate that discovery should be completed within 60 days after the pleadings are closed.
2. What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to? 60 days
3. Have the parties discussed issues relating to claims of privilege or of protection as trial-preparation material, as required by Rule 26(f)(3)(D)? Yes
4. Identify any other discovery issues which should be addressed at the Rule 16 conference, including limitations on discovery, protective Orders needed, or other elements which should be included in a particularized discovery plan. Defendant requests that the Court issue a stay of discovery pending a resolution of Defendant's motion to dismiss because the motion is dispositive, the case is legally baseless, and it would be expensive and burdensome to engage in discovery with an unrepresented party. Plaintiff opposes this request. Defendant also proposes that the parties be limited to one deposition each. Plaintiff agrees to this proposal.
5. If you contend the discovery period to exceed 90 days, please state a reason: _____
6. Do the parties anticipate the need to subpoena any third-parties? No

If yes, to the extent any authorizations or releases are required to be signed, counsel should exchange them in advance of the Rule 16 Conference.

Dated: November 27, 2023

/s/Michael Baughman

Michael E. Baughman (PA 78690)

**TROUTMAN PEPPER HAMILTON
SANDERS LLP**

3000 Two Logan Square

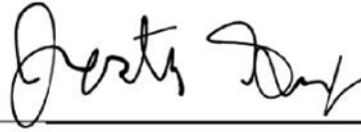
Eighteenth and Arch Streets

Philadelphia, PA 19103-2799

(215) 981-4000

michael.baughman@troutman.com

Attorney for Defendant Bryn Mawr College

A handwritten signature in black ink, appearing to read "Justin Samuels", written over a horizontal line.

Justin Samuels
Pro se Plaintiff